

FILED IN OPEN COURT
U.S.D.C. Atlanta

APR 23 2025

Kevin P. Weinler, Clerk
By: *Cheryl L. Smith* Deputy ClerkIN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA

v.

ALIAKBAR MOHAMMAD AMIN

Criminal Indictment

No. **1 25 - CR - 191**

THE GRAND JURY CHARGES THAT:

Count 1*Threats by Interstate Communication*

On or about March 29, 2025, in the Northern District of Georgia and elsewhere, the defendant, ALIAKBAR MOHAMMAD AMIN, consciously disregarding a substantial risk that his communication would be viewed as threatening violence, knowingly transmitted a communication in interstate and foreign commerce, from the State of Georgia to the State of Texas, that contained a threat to injure Director of National Intelligence Tulsi Gabbard and others; specifically, AMIN direct messaged DNI Gabbard's husband using the messaging app Signal, and made statements, which included, but were not limited to, the following:

- "Prepare to die, you, Tulsi, and everyone you hold dear. America will burn";
- "We will find all of you and kill you wherever you may be";
- "The home you two own in Texas is a legitimate target and will be hit at a time and place of our choosing";

- “Death to America means death to America literally, Tulsi is living on borrowed time”; and
- “You and your family are going to die soon.”

All in violation of Title 18, United States Code, Section 875(c).

Count 2

Threats to United States Official

On or about March 29, 2025, in the Northern District of Georgia and elsewhere, the defendant, ALIAKBAR MOHAMMAD AMIN, did knowingly threaten to assault and murder an official whose killing would be a crime under Title 18, United States Code, Section 1114, that is, Director of National Intelligence Tulsi Gabbard, with intent to retaliate against DNI Gabbard on account of the performance of DNI Gabbard’s official duties.

All in violation of Title 18, United States Code, Section 115(a)(1)(B).

Count 3

Threats to a Member of the Immediate Family of a Federal Official

On or about March 29, 2025, in the Northern District of Georgia and elsewhere, the defendant, ALIAKBAR MOHAMMAD AMIN, did knowingly threaten to assault and murder an immediate family member of an official whose killing would be a crime under Title 18, United States Code, Section 1114, that is, the husband of Director of National Intelligence Tulsi Gabbard, with intent to retaliate against DNI Gabbard on account of the performance of DNI Gabbard’s official duties.

All in violation of Title 18, United States Code, Section 115(a)(1)(A).

A tru BILL
Dan G. Jew
FOREPERSON

RICHARD S. MOULTRIE, JR.
Acting United States Attorney

Matthew Carrico

MATTHEW S. CARRICO
Assistant United States Attorney
Georgia Bar No. 538608

600 U.S. Courthouse
75 Ted Turner Drive SW
Atlanta, GA 30303
404-581-6000; Fax: 404-581-6181